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11 **UNITED STATES DISTRICT COURT**

12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 IN RE: SOCIAL MEDIA ADOLESCENT
14 ADDICTION/PERSONAL INJURY
15 PRODUCTS LIABILITY LITIGATION

16 MDL No. 3047

17 Case Nos.: 4:22-md-03047-YGR-PHK

18 THIS DOCUMENT RELATES TO:
19 ALL ACTIONS

20 **DECLARATION OF CHRISTOPHER
21 CHIOU IN SUPPORT OF OMNIBUS
22 SEALING STIPULATION
23 REGARDING DKT. NO. 1974**

24 Judge: Hon. Yvonne Gonzalez Rogers
25 Magistrate Judge: Hon. Peter H. Kang

26 I, Christopher Chiou, declare as follows:

27 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney
28 of record for Defendants YouTube, LLC and Google LLC (collectively “YouTube”) in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.: 4:22-md-03047-YGR. I am licensed to practice law in the state of California and am admitted to practice before this Court. I submit this declaration in support of the Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief re YouTube’s Search and Production from Noncustodial Source “B” (ECF No. 1974). I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently to their truth if called upon to do so.

29 2. On May 23, 2025, the Parties filed the Parties’ Joint Letter Brief re YouTube’s

1 | Search and Production from Noncustodial Source "B" (ECF No. 1974).

2 3. I have reviewed the document that YouTube seeks to seal pursuant to the Court's
3 Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on
4 my review of the document and in consultation with YouTube, I understand there is good cause
5 to seal the following information:

Dkt. No.	Description	Basis for Sealing
1974	Joint Letter Brief re YouTube's Search and Production from Noncustodial Source "B" redacted at 1-5, with undisputed modifications to remove redactions from (a) four bulleted items on page 1, (b) the paragraph running from page 1-2, and (c) footnote 7.	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on June 13, 2025.

/s/ Christopher Chiou
Christopher Chiou